

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
LAFAYETTE DIVISION**

MARY DOE and NANCY ROE,)	
)	
Plaintiffs)	
)	
v.)	Cause No. 4:18-cv-00089-JEM
)	
PURDUE UNIVERSITY and)	
ALYSSA ROLLOCK)	
and KATIE SERMERSHEIM, in their official and)	
individual capacities)	
)	
Defendants.)	

DEFENDANTS' VERDICT FORMS

Defendants, The Trustees of Purdue University ("Purdue"), Alysa Rollock, and Katie Sermersheim, by counsel, submit their verdict forms. Defendants reserve the right to add to or modify their submission of verdict forms depending on how the testimony and evidence come in at trial. Defendants request that the Court give the verdict forms attached hereto.

Respectfully submitted,

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VERDICT FORM 1

1. Do you find that Purdue University's application of its False Statement Rule to discipline Nancy Roe was motivated by her gender?¹

YES: _____ NO: _____

Instruction: If you answer "NO" to Question 1, do not answer the following question.

2. What amount of damages do you award to Nancy Roe for Purdue University's application of its False Statement Rule to discipline her?

\$_____.

Date

Foreperson

¹The plaintiff must "show that sex was a motivating factor in a university's decision to discipline a student." *Doe v. Purdue Univ.*, 928 F.3d 652, 667 (7th Cir. 2019).

VERDICT FORM 2

1. Do you find that Alysa Rollock's participation in Purdue University's application of its False Statement Rule to discipline Nancy Roe was motivated by her gender?

YES: _____ NO: _____

Instruction: If you answer "NO" to Question 1, do not answer the following questions.

2. What amount do you award to Nancy Roe for damages caused by Alysa Rollock and not caused by any other Defendant?

\$_____.

3. Do you find that Alysa Rollock's conduct was malicious or in reckless disregard of Nancy Roe's rights?²

YES: _____ NO: _____

4. If you find that Alysa Rollock's conduct was malicious or in reckless disregard of Nancy Roe's rights, what amount of punitive damages, if any, do you award against Alysa Rollock?

\$_____.

Date

Foreperson

² Federal Civil Jury Instructions for the Seventh Circuit, Instruction No. 7.28

VERDICT FORM 3

1. Do you find that Katherine Sermersheim's participation in Purdue University's application of its False Statement Rule to discipline Nancy Roe was motivated by her gender?

YES: _____ NO: _____

Instruction: If you answer "NO" to Question 1, do not answer the following questions.

2. What amount do you award to Nancy Roe for damages caused by Katherine Sermersheim and not caused by any other Defendant?

\$_____.

3. Do you find that Katherine Sermersheim's conduct was malicious or in reckless disregard of Nancy Roe's rights?³

YES: _____ NO: _____

4. If you find that Katherine Sermersheim's conduct was malicious or in reckless disregard of Nancy Roe's rights, what amount of punitive damages, if any, do you award against Katherine Sermersheim?

\$_____.

Date

Foreperson

³ Federal Civil Jury Instructions for the Seventh Circuit, Instruction No. 7.28